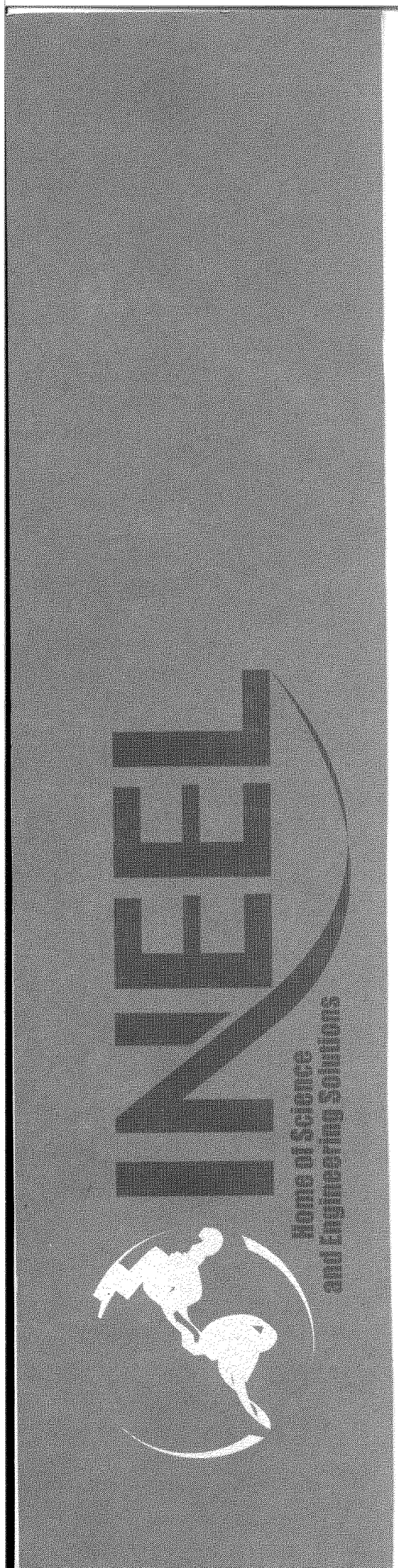
11. Pre-Final Inspection Checklist

INEEL/EXT-02-01184
Revision A

Prefinal Inspection Checklist for the OU 7-10 Glovebox Excavator Method Project (Draft)

Jeffrey D. Bryan
R. Kirt Jamison
September 2002



Idaho National Engineering and Environmental Laboratory
Bechtel BWXT Idaho, LLC

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Prepared for the
U.S. Department of Energy
Assistant Secretary for Environmental Management
Under DOE Idaho Operations Office
Contract DE-AC07-99ID13727

Prefinal Inspection Checklist for the OU 7-10 Glovebox Excavator Method Project (Draft)

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Revision A

September 2002

Approved by

Jeffrey G. Snook, U.S. Department of Energy Federal Project Manager	Date
Wayne Pierre, U.S. Environmental Protection Agency Environmental Cleanup Office, Region X, Project Manager	Date
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ABSTRACT

In accordance with the Federal Facility Agreement and Consent Order, the Agency project managers (i.e., U.S. Environmental Protection Agency and Idaho Department of Environmental Quality project managers) will conduct a Prefinal Inspection of the Operable Unit (OU) 7-10 Glovebox Excavator Method project. This inspection will be conducted concurrent with the Department of Energy Idaho Operations Office Operational Readiness Review and prior to the DOE Authorization to Proceed. This Prefinal Inspection Checklist, as approved, documents the areas agreed upon by all parties to be inspected that will constitute acceptance of project construction activities and readiness for operation of the Glovebox Excavator Method project. This checklist is to be used during the prefinal inspection to ensure that a complete inspection is performed and that results are documented for each area. Appendix A of this document contains the checklist and general instructions for the completing the checklist.

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FIGURES

Prefinal Inspection Checklist for the OU 7-10 Glovebox Excavator Method Project (Draft)

1. PURPOSE

In accordance with the Federal Facility Agreement and Consent Order (FFA/CO), the Agency project managers (i.e., U.S. Environmental Protection Agency and Idaho Department of Environmental Quality project managers) will conduct a Prefinal Inspection of the Operable Unit (OU) 7-10 Glovebox Excavator Method project. This inspection will be conducted concurrent with the Department of Energy Idaho Operations Office (DOE-ID) Operational Readiness Review (ORR) and prior to the DOE Authorization to Proceed. This Prefinal Inspection Checklist, as approved, documents the areas agreed upon by all parties to be inspected that will constitute acceptance of project construction activities and readiness for operation of the Glovebox Excavator Method project. This checklist is to be used during the prefinal inspection to ensure that a complete inspection is performed and that results are documented for each area.

2. APPLICABILITY AND SCOPE

This prefinal inspection checklist applies to the OU 7-10 Glovebox Excavator Method project. The scope encompasses the design, construction, and operational elements necessary for Agencies' acceptance of project construction activities and for declaring the facility ready to operate. As such, the checklist includes project documents, procedures and work control documents, training documents, environmental compliance and regulatory-driven items, construction completion items, specific project systems, components, activities, startup procedures, sample analysis, inspection and maintenance, operating procedures, contingency and emergency procedures, and other areas that the Agency project managers may want to verify have been addressed and are functional prior to facility operation. When finalized this checklist will also include the agreed upon acceptance criteria for each checklist item.

3. PREFINAL/FINAL INSPECTION PROCESS

This section describes the overall prefinal inspection (PFI) process for the OU 7-10 Glovebox Excavator Method project as diagrammed in Figure 3-1. Approval of this Prefinal Inspection Checklist by DOE-ID and the Agency project managers constitutes acceptance of the process identified below.

- DOE-ID submits to the Agencies the draft Prefinal Inspection Checklist (this document including Attachment A) with the Remedial Design package.

- Agency project managers review the draft checklist and provide comments, including the identification of any desired inspection hold points (e.g., for areas to be inspected after startup), to DOE within the 25 days specified in the Agreement to Resolve Disputes.

- DOE-ID responds to Agency comments and incorporates resolutions into the checklist. Specific acceptance criteria are developed for each item in the checklist. The checklist is then finalized and issued as Revision 0 prior to the prefinal inspection.

- DOE-ID notifies the Agencies approximately two weeks prior to the date set for the prefinal inspection (i.e., DOE-ID ORR).

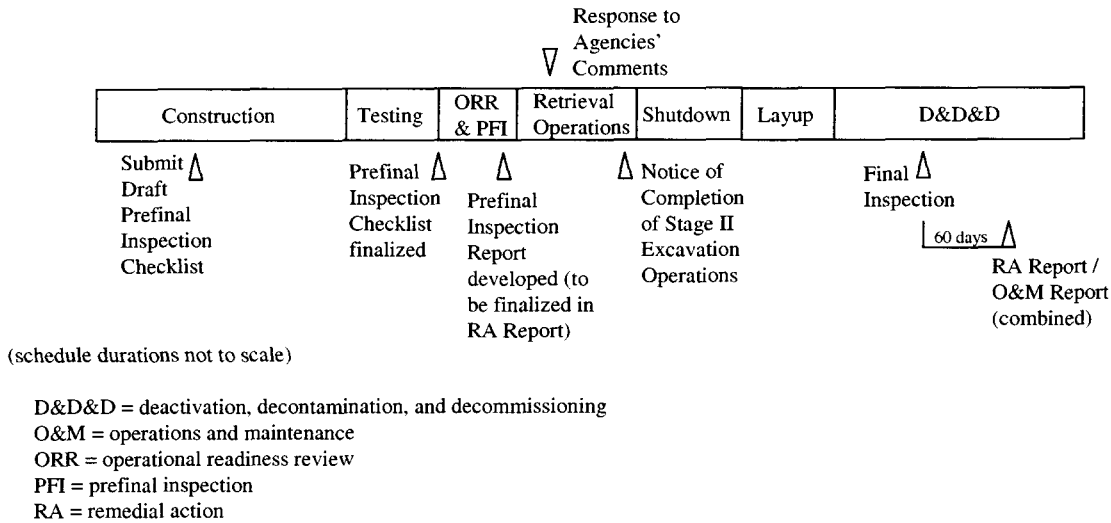

Figure 3-1 Prefinal Inspection process diagram.

- Agency project managers conduct the inspection concurrent with the DOE-ID ORR using the prefinal inspection checklist and the acceptance criteria documented therein. Acceptance is noted for those items that meet the criteria. Issues and/or deficiencies are noted for those items that do not meet the criteria. Outstanding items (i.e., those not capable of being inspected at the time of the prefinal inspection) are also noted.

- Immediately correctable issues and deficiencies should be resolved and Agency concurrence obtained prior to or during inspection closeout. Corrective action plans are developed for issues and deficiencies requiring longer-term resolution and will be tracked through closure by the project. Those deficiencies that require corrective actions to be complete before operations begin (prestart) must be identified separately from those that do not require completion of corrective actions until after operations begin (poststart).

- The Agency project managers, and DOE-ID should reach agreement on the identified issues, deficiencies, and outstanding inspection items, as well as the actions to resolve them, before the prefinal inspection closeout. That is, there should be no disagreement among the parties as to the issues, deficiencies, or outstanding items and the path forward toward an Authorization to Operate and the future performance of a Final Inspection.

- The Agency project managers and the DOE-ID formally establish the timing of the final inspection to coincide with replacement of overburden during deactivation, decontamination, and decommissioning (D&D&D).

- The Prefinal Inspection Report is prepared following completion of the prefinal inspection. The report (described in further detail in Section 4 below) identifies completion of all items detailed in the Prefinal Inspection Checklist, completion status, date of final inspection, and, as appropriate, the proposed corrective actions and schedule for completion of any open items. Along with the Prefinal Inspection Report, an information copy of the ORR Report and DOE-ID's Authorization to Operate is provided as additional confirmation of the OU 7-10 Glovebox Excavator Method project's operational status.

- DOE-ID submits the Prefinal Inspection Report to the Agency project managers.

- Agency project managers review the Prefinal Inspection Report and provide any comments to DOE-ID.

- DOE-ID prepares responses to comments by the Agencies and addresses resolutions through established teleconferences or by sending the formal responses. The Prefinal Inspection Report is not revised, but will be finalized in the context of the Remedial Action Report.

- During the waste zone material retrieval period, DOE-ID provides 1-week (approximate) advance notice to the Agency project managers of any identified hold points for the inspection of outstanding items (i.e., if identified in the Prefinal Inspection Report). Results are noted for future inclusion in the Final Inspection Report (an element of the RA report).

- DOE-ID submits to the Agency project managers the Notification of Completion of Stage II Excavation.

- Agency project managers perform remaining inspections/reinspections and witness activities as agreed upon and identified in Appendix A.

- Agency project managers perform the final inspection during overburden replacement that is part of facility D&D&D.

- Per the Agreement to Resolve Disputes, DOE-ID submits to the Agency project managers within 60 days of the Final Inspection the Draft Remedial Action (RA) Report. Review and approval of the Draft RA Report is pursuant to the FFA/CO process for primary documents. The Final Inspection Report is included as an element of the Draft RA Report.

4. ELEMENTS OF THE PREFINAL INSPECTION REPORT

The Prefinal Inspection Report is an FFA/CO secondary document that is prepared by BBWI for DOE-ID. Although DOE-ID will respond to comments received, the Prefinal Inspection Report will not be revised but, rather, will be finalized in the context of the primary RA Report. The following elements are planned to be included in the Prefinal Inspection Report.

4.1 Description of the Prefinal Inspection Process

The Prefinal Inspection process, up to and including the preparation of the Final Inspection Report, is included in the Prefinal Inspection Report as part of the agreed upon and subsequently completed Prefinal Inspection Checklist.

4.2 Completed Prefinal Inspection Checklist

The completed checklist (this document including Attachment A) is included in the Prefinal Inspection Report to document the results of the prefinal inspection.

4.3 Discussion of Findings and Outstanding Items

A discussion of the inspection findings, including any deficiencies observed, will be included in the Prefinal Inspection Report. All documented findings will be tied to appropriate checklist items. Per the

FFA/CO, the report will also include discussion of any outstanding construction requirements as well as any checklist item that was not capable of being inspected at the time of the Prefinal Inspection.

4.4 Corrective Actions Plan and Inspection of Outstanding Items

The Prefinal Inspection Report will document corrective actions taken, and any yet to be taken, to correct deficiencies identified in the inspection. The corrective actions will be summarized in an integrated corrective actions plan and identify the following:

- Action(s) required to resolve item(s) (i.e., proposed resolutions).
- Acceptance criteria or standard(s).
- Plan for inspection (i.e., for outstanding items) or re-inspection (i.e., for deficient items). Inspections may either be performed as an intermediate (i.e., hold-point) inspection or as a part of Final Inspection.
- Completion status (i.e., open, closed, pending) for individual corrective action plans, by finding/deficiency or inspection item as appropriate.
- Planned date of completion (if not yet completed) for individual corrective action plans, by finding/deficiency or inspection item as appropriate.

Permission to operate the facility should be granted upon Agency project managers' agreement with the identified corrective actions—that is, with those that were completed before the prefinal inspection closeout as well as those that are completed before and during operations.

4.5 Date of Final Inspection

The Prefinal Inspection Report will document the timing (i.e., event-based start) agreed upon by DOE-ID and the Agency project managers for the final inspection. This date is planned to coincide with the replacement of overburden on the excavation site during facility D&D&D.

4.6 DOE Operational Readiness Report

Per Appendix A of the *OU 7-10 Remedial Design/Remedial Action Scope of Work and Remedial Design Work Plan: Operable Unit 7-10 (Pit 9 Project Interim Action)*, an information copy of the DOE ORR Report will be included as an attachment to the Prefinal Inspection Report.

4.7 DOE Authorization to Operate

Per Appendix A of the *OU 7-10 Remedial Design/Remedial Action Scope of Work and Remedial Design Work Plan: Operable Unit 7-10 (Pit 9 Project Interim Action)*, an information copy of the DOE Authorization to Operate will be included as an attachment to the Prefinal Inspection Report.

5. REFERENCES

Agreement to Resolve Disputes, the State of Idaho, United States Environmental Protection Agency, and the United States Department of Energy, April18, 2002.

DOE/ID/12584-152, "Remedial Design and Remedial Action Guidance for the Idaho National Engineering Laboratory," (DOE-ID 1994).

Federal Facility Agreement and Consent Order for the Idaho National Engineering Laboratory (FFA/CO) (DOE-ID 1991).

Remedial Design/Remedial Action Scope of Work and Remedial Design Work Plan: Operable Unit 7-10 (Pit 9 Project Interim Action), INEL-94/0110, Revision 2, October 1997.

Appendix A

Prefinal Inspection Checklist for the OU 7-10 Glovebox Excavator Method Project (Draft)

Instructions for Completing the Prefinal Inspection Checklist

The following instructions are included for filling out the Prefinal Inspection Checklist.

Column 1: Inspection Item — Identifies the item(s) to be checked. No inspector (i.e., U.S. EPA or IDEQ) notation is required in this column

Column 2: Status (Sat / Unsat) — The inspector(s) that check the item shall note whether the inspection was satisfactory (Sat) or unsatisfactory (Unsat) and shall note any deficiencies in column 5. If an item cannot be inspected prior to operations start and is not required to start operations, its inspection will be included in the Final Inspection Report.

Column 3: Inspector — The inspector(s) that check the item shall place their initials in this column to indicate that the inspection was completed.

Column 4: Date — The inspector(s) that check the item shall note the date the inspection was completed.

Column 5: Field Notes or Description of Finding or Deficiency — Inspectors shall use this column to describe any deficiency noted during their inspection and may also use this column to make field notes.

Upon completion of the Prefinal Inspection, each inspector shall fill out the signature block below.

Prefinal Inspection Checklist Signature Block

Inspector Name	Inspector Signature	Inspector Initials	Date

Prefinal Inspection Checklist
for the OU 7-10 Glovebox Excavator Method Project (Draft)

Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
1. Project Documents This section of the checklist will confirm that the following project documents are complete and available onsite.				
a. Operations Health and Safety Plan				
b. Field Sampling Plan				
c. Quality Assurance Project Plan				
d. O&M Plan				
e. Essential drawings				
f. Personnel exposure estimate is completed				
g. Final Documented Safety Analysis (RWMC SAR Addendum)				
h. Criticality Safety Evaluation				
i. Final Fire Hazard Analysis				
j. Update to Addendum 3 to INEEL Emergency Plan/ RCRA Contingency Plan (PLN-114)				
k. Hostile Environment Plan				
l. Security Plan				

Prefinal Inspection Checklist
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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
2. Procedures and Work Control Documents This section of the checklist will confirm that procedures and work control documents are complete, approved, and on-site ready for use.				
a. Required Material Safety Data Sheets				
b. Emergency notification				
c. Leakage and spill response procedures				
d. Waste packaging and transportation procedures				
e. Inspection procedures				
f. Operation and maintenance procedures				
g. Log keeping procedures				
h. Access control procedures				
i. Job safety analyses				

Prefinal Inspection Checklist
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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
3. Personnel Training This section of the checklist will confirm, among other associated items, that training requirements for operations and maintenance personnel have been identified and scheduled, that the health and safety training program and a procedure training program have been established, and that required operations personnel have completed the requisite training requirements identified below:				
a. HASP training				
b. OSHA 29 CFR 1910.120 24 or 40 hr "Hazardous Waste Operations and Emergency Response" (HAZWOPER), as applicable				
c. OSHA 29 CFR 1910.120 8 hr supervisor				
d. Radiological Worker I or II, as applicable				
e. Conduct of Operations training				
f. Conduct of Maintenance training				
g. Operating procedures				
h. RCRA emergency coordinators are trained and on-Site				
i. RCRA training for storage and hazardous waste management (40 CFR 264.16)				
j. RWMC Access training				

Prefinal Inspection Checklist
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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
4. Environmental Compliance/Regulatory Documentation This section of the checklist will confirm that documents associated with environmental compliance and regulatory issues are complete, approved, and on-site for use.				
a. ARAR Implementation Matrix				
b. Storm Water Pollution Prevention Plan				
c. NESHAPs Radiological Monitoring Plan				
d. Environmental Checklist				
e. Waste Management Plan				
f. Appendix L to INEEL RCRA Contingency/Emergency Plan				

Prefinal Inspection Checklist
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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
5. Facility and Infrastructure Completion This section of the checklist will confirm inspection of facility and infrastructure construction items to verify proper installation. Specific construction features associated with ARAR requirements will be included. Electrical systems have been tested and basic functions of installed equipment (e.g., lights, blowers, motor control centers, etc.) have been confirmed. Other items to be addressed will include equipment labeling, required signage (e.g., radiation area notifications, restricted areas, and as required by RCRA/CERCLA and OSHA requirements) and spare parts. Major construction items include Weather Enclosure Structure, Retrieval Confinement Structure, Packaging Glovebox System, and waste storage.				
a. Facility Turnover and Acceptance Plan completed and issued				
b. CC Testing complete				
c. Occupancy Safety Review Report Issued				
d. SO and Integrated Testing Complete				

Prefinal Inspection Checklist
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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
6. Systems and Components This section of the checklist will confirm inspection or testing, as applicable, of systems and component items to verify installation, inspection, and testing to meet system-level requirements. Specific items to be addressed will include things such as equipment labeling and availability of needed spare parts. Major systems and component items include:				
a. Excavation System				
b. Fissile Material Monitor (FMM)				
c. Closed Circuit Television (CCTV) System				
d. Fire Protection System				
e. Electrical Power System (Normal, Stand-by, UPS)				
f. Heating and Ventilation System				
g. Breathing Air System				
h. Plant Air System				
i. Dust Suppression System (water spray, fogging)				
j. Criticality Alarm System				
k. Life Safety Systems				
l. Radiological Monitoring (CAM and RAM)				
m. Emissions Monitoring System				
n. PGS Cart Drive Systems				
o. PGS Hoist Systems				
p. Storage System (when defined)				
q. Drum Assay System (when defined)				

Prefinal Inspection Checklist
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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
7. Start-up, Routine, and Compliance Monitoring This section of the checklist will confirm that items such as written procedures for sample collection, preparation/preservation and handling are maintained on-site for each type of sample to be obtained, including QA/QC samples. Sample collection logs will be verified to be in place with procedures for maintaining them.				
a. Sampling procedures approved and issued				
b. Sample Transportation Plan approved and issued				
c. Sample Collection Logs established and ready for use				
8. Sample Analysis This section of the checklist will confirm that controls are in place to ensure that the analytical laboratory is using U.S. EPA-approved analytical methods and procedures (where available), and that the data generated will be appropriately validated and transmitted to the required parties within the time frame identified in the requirements.				
a. Laboratory procedures are approved and issued				
b. GEM/Analytical Laboratory Interface Agreement approved and issued				

Prefinal Inspection Checklist
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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
9. Inspections and Maintenance This section of the checklist will verify that processes and procedures for inspections and maintenance of structures, systems, and components are complete, approved, and on-site for use. This includes inspection and maintenance logs for basic system operations (such as checks for temperature control, checks of freeze protection) as well as upset conditions. The logs shall provide sufficient detail to determine the nature of and need for the maintenance activity, equipment/materials used, duration of any system down-time associated with the maintenance activity, date of the maintenance activity, etc. These logs will be maintained on-site. Major structures, systems and component items include:				
Structures/Facilities				
a. Weather Enclosure Structure				
b. Retrieval Confinement Structure				
c. Packaging Glovebox System				
d. Waste Storage				
Systems/Components				
a. Excavation System				
b. Fissile Material Monitor (FMM)				
c. Closed Circuit Television (CCTV) System				
d. Fire Protection System				
e. Electrical Power System (Normal, Stand-by, UPS)				
f. Heating and Ventilation System				

Prefinal Inspection Checklist
for the OU 7-10 Glovebox Excavator Method Project (Draft)

Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
9. Inspections and Maintenance *Systems/Components* (continued)				
g. Breathing Air System				
h. Plant Air System				
i. Dust Suppression System (water spray, fogging)				
j. Criticality Alarm System				
k. Life Safety Systems				
l. Radiological Monitoring (CAM and RAM)				
m. Emissions Monitoring System				
n. PGS Cart Drive Systems				
o. PGS Hoist Systems				
p. Storage System (when defined)				
q. Drum Assay System (when defined)				

Prefinal Inspection Checklist
for the OU 7-10 Glovebox Excavator Method Project (Draft)

Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
10. Standard Operating Procedures This section of the checklist will verify that written standard operating procedures have been developed and are maintained on-site. Standard operating procedures fall into the following categories shown below:				
Normal Operating Procedures				
a. Initial Facility Startup				
b. Overburden Removal				
c. Waste Retrieval				
d. Waste Handling, Packaging, and Storage				
e. Container Changeout				
f. Drum Transport				
g. Waste Sampling and Sample Transfer				
h. Underburden Sampling and Analysis				
i. Bag-In and Bag-Out Operations				
j. Facility Shutdown and D&D&D Preparation				
k. Setup, Operation and Maintenance of the Dust Suppression System				
l. Setup, Operation and Maintenance of the Operate CCTV System				
m. Setup, Operation and Maintenance of the Fissile Material Monitor				
n. Setup, Operation, and Maintenance of the Drum Assembly System				

Prefinal Inspection Checklist
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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
10. Standard Operating Procedures *Normal Operating Procedures* (continued)				
o. Setup, Operation and Maintenance of the Emission Monitoring Systems				
p. Setup, Operation and Maintenance of the HEPA Filter and Ventilation Systems				
q. Drum Assay System				
Operation Forms				
a. Equipment Supplies				
b. Excavator Checks				
c. Dust Suppression System Checks				
d. Operator Logs and Shift Turnover Checklist				
e. Operator Rounds				
f. Video Tape Log				
g. Video Tracking Log				
h. Sampling Log				
i. RadCon Instrument Check				
j. Drum Tracking Log				
k. Drum Assay Log				
l. Prohibited Items Checklist (based on TBD WAC)				

Prefinal Inspection Checklist
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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
11. Contingency Plan/Emergency Response This section of the checklist will verify that written contingency plans/emergency response procedures on the following subjects have been developed and are maintained on-site.				
Emergency Abnormal and Alarm Response Procedures (EARs)				
a. Response to Power Loss				
b. Response to Firewater Loss				
c. Response to Ventilation Loss				
d. Response to Confinement Breach				
e. Response to High Radiological Alarms				
f. Response to an RWMC or Site Area Evacuation				
g. Response to Fire				
h. Response to Radioactive or Hazardous Material Spills				
i. Response to High Winds				

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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
11. Contingency Plan/Emergency Response (Continued)				
RWMC Emergency Procedures/Contingency Plans				
a. System shutdown notification system is in place and has been tested for proper operation				
b. Abnormal conditions procedures have been approved and issued				
c. Security surveillance and notification requirements have been established with the facility security organization				
d. Emergency alarm/notification systems have been tested				
Initial Actions				
a. RWMC Emergency Response Organization Activation				
b. Event Classification/Emergency Action Levels				
c. Emergency Event Notifications				
d. Initial Radiological and Non-radiological Consequence Assessment (ECC/CP)				
e. Notification of Next of Kin				
Protective Actions				
a. Determining and Implementing Protective Actions for RWMC				
b. Relocation of Evacuees				
c. Request and Control of Evacuation Buses				

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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
11. Contingency Plan/Emergency Response (Continued)				
Operations Events				
a. Transportation Accidents on the INEEL				
b. Range Fires on the INEEL				
c. Fire/Explosion at RWMC				
d. Loss of Commercial Power—RWMC				
e. Response to Natural Phenomena on the INEEL				
f. On-Scene/Unified Command on the INEEL				
Nonradiological Hazardous Materials Events				
a. Nonradiological Hazardous Materials Decontamination for Emergency Workers and Equipment				
b. Nonradiological Hazardous Material Release Concentrations in Air at 30 Meters				
Radiological Events				
a. RWMC Facility Emergency Radiological Monitoring				
Safeguards and Security Events				
a. INEEL Security Events				
Control and Mitigation				
a. Emergency Exposure Control				
b. Reentry				
c. Emergency Event Termination				
Recovery				
a. Recovery				

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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
11. Contingency Plan/Emergency Response (Continued)				
Command Post Operations				
a. Emergency Response Organization Logkeeping				
b. Emergency Information Management System				
c. Radio Protocol				
d. Command Post/Emergency Control Center/Emergency Operations Center Relocation				
12. Equipment and System Readiness				
a. Personal protection equipment is identified and available				
b. Medical and first aid supplies are identified and available				
c. Fire protection equipment is identified and available				
d. Recommended spare parts are identified and available				

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Inspection Item	Status (Sat/Unsat)	Inspector	Date	Field Notes or Description of Finding/Deficiency
13. Miscellaneous This section of the checklist will verify that miscellaneous facilities and support procedures have been developed and are maintained on-site. This includes (but is not limited to) items associated with the CERCLA storage facility such as waste storage inspection records, personal protective equipment storage areas, etc.				
a. Inspect excavation site at the end of retrieval operations to confirm that the retrieval objectives have been met.				
b. Witness excavation site at the start of grouting operations.				Closure for this item will be addressed in the RA Report.
c. Witness excavation site at the start of overburden replacement (with returned overburden or new).				Closure for this item will be addressed in the RA Report.